

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- : **NOTICE OF MOTION**

JOSHUA ADAM SCHULTE, :

Defendant. : 17 Cr. 548 (PAC)
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PLEASE TAKE NOTICE that the defendant **Joshua Adam Schulte**, by and through his counsel, will move this Court, pursuant to Fed. R. Crim. P. 12(b)(3)(C) and the Fourth Amendment, upon the Declaration of Sabrina P. Shroff, executed July 3, 2019, the Declaration of Steven M. Bellovin, Ph.D., in Support of Suppression, executed June 28, 2019, the accompanying memorandum of law, and all prior proceedings herein, for an order suppressing all evidence obtained pursuant to the search warrants issued in this case between March 13, 2017, and May 17, 2017, inclusive, and the fruits of such evidence. At a minimum, the defendant seeks an evidentiary hearing pursuant to *Franks v. Delaware*, 438 U.S. 154 (1978).

Dated: New York, New York
July 3, 2019

Respectfully submitted,
Federal Defenders of New York

/s/ Sabrina P. Shroff

By: _____
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